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March 18, 2025

VIA ECF

Honorable Brian R. Martinotti, U.S.D.J.
United States District Court
District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

**Re: *In re Selenious Acid Litigation*, No. 2:24-cv-07791 (BRM) (CLW) (Consolidated);
American Regent, Inc. v. Somerset Therapeutics, LLC, et al., No. 2:24-cv-07807
(BRM)(CLW);
American Regent, Inc. v. Somerset Therapeutics, LLC, et al., No. 2:24-cv-11124
(BRM)(CLW); and
American Regent, Inc. v. Somerset Therapeutics, LLC, et al., No. 2:24-cv-11138
(BRM)(CLW)**

Dear Judge Martinotti:

We, along with Sterne, Kessler, Goldstein & Fox P.L.L.C., counsel for Plaintiff American Regent, Inc., and Midlige Richter, LLC and Winston & Strawn LLP, counsel for Defendants Somerset Therapeutics, LLC, Somerset Pharma, LLC, and Odin Pharmaceuticals, LLC, jointly submit the attached Consent Judgment for the Court's consideration. If Your Honor finds this document acceptable, the parties respectfully request that Your Honor execute the document and direct its entry on the docket.

Please note that this Consent Judgment does not impact in any way the claims, counterclaims, or affirmative defenses in matters pending between Plaintiff and the other defendants¹ that were consolidated in the above-referenced matter.

Should the Court require anything further, the parties will make themselves available at the Court's convenience. The parties thank the Court for its time and assistance in this matter.

¹ Aspiro Pharma Ltd. (C.A. Nos. 24-7794 and 24-11109), Cipla USA, Inc. and Cipla Limited (C.A. Nos. 24-7796, 24-11112), Gland Pharma Limited (C.A. Nos. 24-7802 and 24-11116), Hikma Pharmaceuticals USA Inc. (C.A. Nos. 24-7803 and 24-11118), RK Pharma, Inc. (C.A. Nos. 24-7805 and 24-11102), Sun Pharmaceutical Industries Limited and Sun Pharmaceutical Industries, Inc. (C.A. Nos. 24-7810 and 24-11126), Xiromed, LLC and Xiromed Pharma España, S.L. (C.A. Nos. 24-7811 and 24-11130), and Zydus Pharmaceuticals (USA) Inc. (C.A. Nos. 24-7812 and 24-11133).

The Honorable Brian R. Martinotti, U.S.D.J.
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Respectfully submitted,

s/ Charles H. Chevalier
Charles H. Chevalier

Attachment

cc: All counsel of record via ECF and counsel for Somerset Therapeutics, LLC, Somerset
Pharma, LLC and Odin Pharmaceuticals, LLC via ECF and e-mail